

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re

THE COMMONWEALTH OF PUERTO RICO, THE
PUERTO RICO SALES TAX FINANCING
CORPORATION, THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, THE PUERTO RICO ELECTRIC
POWER AUTHORITY, AND THE PUERTO
RICOPUBLIC BUILDINGS AUTHORITY, THE
FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

Debtors.¹

PROMESA
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**URGENT UNOPPOSED MOTION OF DICICCO, GULMAN, & COMPANY, FINANCIAL
ADVISOR TO THE SPECIAL CLAIMS COMMITTEE OF THE FINANCIAL
OVERSIGHT AND MANAGEMENT BOARD, TO EXTEND ITS DEADLINE TO FILE A
VERIFIED STATEMENT IN COMPLIANCE WITH REQUIREMENTS UNDER THE
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURES ACT, PUB. L. NO. 117-82**

To The Honorable United States District Court Judge Laura Taylor Swain:

DiCicco, Gulman, & Company (“DGC”)², financial advisor to the Special Claims Committee of the Financial Oversight and Management Board (the “Oversight Board”) as representative of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Corporation, the Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK- 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² DGC is a division of PKF O'Connor Davies LLP.

Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Electric Power Authority, the Puerto Rico Public Buildings Authority (collectively, the “Debtors”) in the above-captioned title III cases (the “Title III Cases”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),³ respectfully submits this motion (the “Motion”) requesting entry of an order substantially in the form attached hereto as Exhibit A, extending the deadline for DGC to file its verified statement (the “Verified Statement”) pursuant to the disclosure requirements set forth in the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”) and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure and in accordance with this honorable Court’s directive in its *Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* (the “Order”) [Docket No. 20467]. In support of this Motion, DGC respectfully states as follows:

BACKGROUND

1. On February 22, 2022, the Oversight Board filed the *Motion of Financial Oversight and Management Board for Puerto Rico Requesting Order Approving Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 20194] (the “PRRADA Motion”), seeking Court approval of a list of material interested parties attached thereto as Exhibit A (the “MIP List”) in compliance with this Court’s *Order Concerning Compliance with the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 19980].

2. On March 21, 2022, this Court entered its *Order Regarding Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No.

³ PROMESA has been codified in 48 U.S.C. §§ 2101-2241.

20419], directing the Oversight Board to expand and resubmit the MIP List so that it includes holders of inactive claims.

3. On March 29, 2022, the Oversight Board filed the *Notice of Filing Amended List of Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 20458], which attached a list of material interested parties with respect to all Title III Debtors as Exhibit A thereto (the “Amended MIP List”). The Amended MIP List separated the material interested parties in separate schedules for each of the Title III Debtors.

4. On March 30, 2022, this Court entered the Order approving the Amended MIP List and directing all professionals included in the Amended MIP List to file the disclosures required under PRRADA by May 16, 2022.

5. DGC is in the process of drafting its Verified Statement to PRRADA. DGC requires an additional 10 days from the date of this Motion to finalize and file its Verified Statement⁴.

6. DGC files this Motion with the U.S. Trustee’s consent for the relief requested herein.

7. No prior request for relief sought in this Motion has been made to this or any other court.

RELIEF REQUESTED

WHEREFORE, DGC respectfully requests that this Court enter an order substantially in the form attached hereto as Exhibit A, permitting DGC to file its Verified Statement by June 10, 2022 and granting all other relief that this Court deems just and proper.

⁴ For the avoidance of doubt, DGC requests an extension of time to June 10 to file its Verified Statement.

Boston, Massachusetts
Dated: May 31, 2022

/s/ Sunni P. Beville

Sunni P. Beville, Esq.

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acting through the Special Claims Committee*

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re

THE COMMONWEALTH OF PUERTO RICO, THE
PUERTO RICO SALES TAX FINANCING
CORPORATION, THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, THE PUERTO RICO ELECTRIC
POWER AUTHORITY, AND THE PUERTO
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FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

Debtors.⁵

PROMESA
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**ORDER GRANTING THE URGENT UNOPPOSED MOTION OF DICICCO, GULMAN,
& COMPANY, FINANCIAL ADVISOR TO THE SPECIAL CLAIMS COMMITTEE OF
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, TO EXTEND ITS
DEADLINE TO FILE A VERIFIED STATEMENT IN COMPLIANCE WITH
REQUIREMENTS UNDER THE PUERTO RICO RECOVERY ACCURACY IN
DISCLOSURES ACT, PUB. L. NO. 117-82**

*Upon the Urgent Unopposed Motion Of DiCicco, Gulman, & Company, Financial Advisor
To The Special Claims Committee Of The Financial Oversight And Management Board, To Extend
Its Deadline To File A Verified Statement In Compliance With Requirements Under The Puerto Rico*

⁵ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Recovery Accuracy In Disclosures Act, Pub. L. No. 117-82 (the “Motion”); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT**:

1. The Motion is granted as set forth herein.
2. The deadline for DGC⁶ to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [Docket No. 20467] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82, shall be extended to June 10, 2022.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

SO ORDERED.

Dated: _____, 2022
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge

⁶ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.